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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROWLAND MARCUS ANDRADE,

Defendant.

Case No. 20-cr-00249-RS

**DECLARATION OF JOHN M.
PIERCE**

*In Support of Defendant's Motion for
Administrative Relief*

DECLARATION OF JOHN M. PIERCE

I, John M. Pierce, declare as follows:

1. I am counsel for Defendant Rowland Marcus Andrade in the above-captioned matter. I submit this declaration in support of Defendant's Motion for Administrative Relief to File Reply in Excess of 15 pages.

2. Civil Local Rule 7-4(b) limits replies to 15 pages. The government's opposition addresses multiple distinct issues including flight risk, danger to the community, the standard for release pending appeal, and restitution/forfeiture orders. *See* ECF No. [761]. It also incorporates by reference numerous prior filings.

3. The underlying record is unusually complex, spanning more than 700 docket entries and a five-year litigation history. To fully and fairly respond to the government's opposition,

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1 Defendant requires additional space to address at least ten substantial appellate issues, related
2 evidentiary rulings, and overlapping restitution and forfeiture matters.

3 4. Accordingly, Defendant respectfully requests leave to file a Reply of up to 25 pages.
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6 I declare under penalty of perjury that the foregoing is true and correct.

7 Executed on October 2, 2025, in Woodland Hills, California.
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John M. Pierce, Esq.

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